

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ST LOUIS

SIXTH JUDICIAL DISTRICT

Personal Injury

Jean Green,

Court File No.: _____

Plaintiff,

vs.

SUMMONS

(to be tried in the City of Virginia)

Wells Fargo Bank, N.A.,

Defendant.

THE STATE OF MINNESOTA TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to serve upon the Plaintiff's attorney an Answer to the Complaint of the Plaintiff, a copy of which is herewith served upon you, within 20 days after service of same upon you, exclusive of the day of such service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

Dated this 19 day of December, 2018.

TRENTI LAW FIRM
225 First Street North, Suite 1000
PO Box 958
Virginia, MN 55792
218-749-1962
Attorneys for Plaintiff

Per: _____

Joseph Leoni - #163053

E-mail: jleoni@trentilaw.com

EXHIBIT

A

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ST LOUIS

SIXTH JUDICIAL DISTRICT
Personal Injury

Jean Green,

Court File No.: _____

Plaintiff,

vs.

**NOTICE OF ACKNOWLEDGEMENT
OF SERVICE BY MAIL**

Wells Fargo Bank, N.A.,

Defendant.

TO: DEFENDANT ABOVE-NAMED:

The enclosed Summons and Complaint are served pursuant to Rule 4.05 of the Minnesota Rules of Civil Procedure.

You must complete the acknowledgement part of this form and return one copy of the completed form to the sender within 20 days.

Signing this Acknowledgment of Receipt is only an admission that you have received the Summons and Complaint.

You must sign and date the acknowledgment. If you are served on behalf of a corporation, unincorporated association (including a partnership), or other entity, you must indicate under your signature your relationship to that entity. If you are served on behalf of another person and you are authorized to receive process, you must indicate under your signature your authority.

If you do not complete and return the form to the sender within 20 days, you (or the party on whose behalf you are being served) may be required to pay any expenses incurred in serving a Summons and Complaint in any other manner permitted by law.

If you do complete and return this form, you (or the party on whose behalf you are being served) must answer the Complaint within 20 days. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

I declare, under penalty of perjury, that this Notice and Acknowledgment of Receipt of Summons and Complaint were served on 12-19, 2018.



Signature

12-19

Date of Signature

ACKNOWLEDGEMENT OF RECEIPT OF SUMMONS AND COMPLAINT

I declare, under penalty of perjury, that I received a copy of the Summons and Complaint in the above-captioned matter at: 2345 Rice Street, Suite 230, Roseville, MN 55113.

Signature

Relationship to Entity/Authority
Receive Service of Process

Date of Signature

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF ST LOUIS

SIXTH JUDICIAL DISTRICT

Personal Injury

Jean Green,

Court File No.: _____

Plaintiff,

vs.

COMPLAINT

Wells Fargo Bank, N.A.,

Defendant.

Comes now the Plaintiff and for her cause of action against the Defendant states and alleges:

I.

That on or about the 28th day of April, 2017, the Plaintiff was a pedestrian and walking in front of the premises of the Defendant; that due to the negligence, negligent and careless maintenance of the outside premises and failure in its duty to maintain the area of the property in a safe manner, the Plaintiff suffered a fall on the ice.

II.

That as a result of the above described negligence by the Defendant as aforesaid, Plaintiff herein suffered severe and permanent injuries, the nature and extent of which has not been finally determined; suffered great pain of body and mind; incurred medical and related expenses; suffered loss of wages; suffered impairment of earning capacity and was otherwise damaged, all of which will continue in the future.

III.

That the Plaintiff herein is entitled to pre-judgment interest.

WHEREFORE, Plaintiff demands judgment against the Defendant for recovery of reasonable damages in an amount in excess of Fifty Thousand and No/100 Dollars (\$50,000), together with costs, disbursements and interest as alleged herein.

Dated this 14 day of December, 2018.

TRENTI LAW FIRM
225 First Street North, Suite 1000
PO Box 958
Virginia, MN 55792
218-749-1962
Attorneys for Plaintiff

Per: _____

Joseph Leoni - #163053
E-mail: jleoni@trentilaw.com

ACKNOWLEDGEMENT

The undersigned hereby acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded pursuant to Minnesota Statutes, § 549.21, Subd. 2 to the party against whom the allegations in this pleading are asserted.

TRENTI LAW FIRM
225 First Street North, Suite 1000
P. O. Box 958
Virginia, MN 55792
218-749-1962
Attorneys for Plaintiff

Per: _____

Joseph Leoni - #163053
E-mail: jleoni@trentilaw.com